

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SJUNDE AP-FONDEN and THE CLEVELAND
BAKERS AND TEAMSTERS PENSION FUND,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY, et al.

Defendants.

17 Civ. 08457 (JMF) (GS)

**DECLARATION OF WILLIAM J. TRACH IN SUPPORT OF DEFENDANTS’
STATEMENT IN SUPPORT OF PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

I, William J. Trach, hereby declare pursuant to 28 U.S.C. § 1746 that:

1. I am an attorney at Latham & Watkins LLP, counsel for Defendants General Electric Co. and Jeffrey S. Bornstein. I am admitted to practice in the State of Massachusetts and admitted *pro hac vice* to practice before this Court in the above-captioned matter. I submit this Declaration in support of Defendants’ Statement in support of Plaintiffs’ Motion for Preliminary Approval of Settlement.

2. Attached as Exhibit 1 is a true and correct copy of Intervenor Kevin Mahar and Mitchell West’s consolidated amended class action complaint in *Mahar v. Gen. Elec. Co. et al.*, Index. No. 653648/2018 (N.Y. Sup. Ct.) (the “State Action”), ECF No.78, dated March 15, 2019.

3. Attached as Exhibit 2 is a true and correct copy of the Decision and Order of New York Commercial Division Judge the Honorable Andrew Borrok, ECF No. 155, dated and entered in the State Action on October 15, 2019.

Executed on the 17th day of December 2024.

A handwritten signature in black ink, appearing to read "William J. Trach", written over a horizontal line.

William J. Trach